

**REMARKS/ARGUMENTS**

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 1-4, 6-10 and 20-21 are pending in this application.

**Rejections Under 35 U.S.C. §103:**

Claims 1-4, 6-10 and 20-21 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Koreeda (U.S. ‘137) in view of Chinnappan (U.S. Patent Publication No. 2002-0082932 A1). Claims 6-9 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Koreeda in view of Chinnappan and further in view of Blinn et al (U.S. ‘622, hereinafter “Blinn”). Applicant respectfully traverses these rejections.

Chinnappan was filed in the U.S. Patent Office on December 22, 2000 and claims priority from provisional application no. 60/235,945 filed on September 26, 2000. Accordingly, the earliest possible effective “prior art” date of Chinnappan is September 26, 2000.

The present application is entitled to the benefit of priority rights at least based on U.S. provisional application no. 60/214,399 which was filed on June 28, 2000 (i.e., before the earliest possible effective “prior art” date of Chinnappan”). Applicant submits that U.S. provisional application no. 60/214,399 fully supports the present claimed invention under 35 U.S.C. §112, first paragraph. In this regard, the Examiner’s attention is directed to Figs. 19 and 25 and accompanying written description on pages 14-21 of the provisional application.

Accordingly, it is believed that Chinnappan is therefore not “prior art” with respect to the present application. It is therefore not believed necessary at this time to

**BRIEL et al.**  
**Application No. 09/980,636**  
**September 28, 2005**

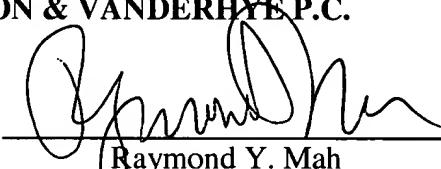
discuss the technological deficiencies of this document and hence the combination of this document with Koreeda and/or Blinn. Applicant therefore respectfully requests that the above rejections of claims 1-4, 6-10 and 20-21 under 35 U.S.C. §103 be withdrawn.

**Conclusion:**

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

**NIXON & VANDERHYPE P.C.**

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